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LAW OFFICES

VICTOR J. TOTH, P.C.

2719 Soapstone Drive
Reston, Virginia 22091

OCT 11 2 1993

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Washington Office
2000 L Street, N.W.
Suite 200
Washington, D.C. 20036

October 12, 1993

Telephone
(703) - 476-5515
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William F. Caton
Secretary
Federal Communications Commission
1919 M Street, NW
Washington, D.C. 20554

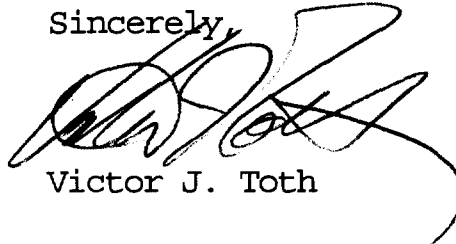
Ex Parte Submission

Re: CC Docket 93-36
LOF 16701.0/18.00

Dear Mr. Caton:

On behalf of certain interexchanged carrier clients of this firm the undersigned met on this date with members of the staff of the Office of Policy and program Planning Division of the Common Carrier Bureau to describe the concept of a "maximum rate/disputed rate" as an alternative to rate/range tariffs for non-dominant carriers. In support of this presentation the attached tariff pages were furnished to the staff.

Sincerely,



Victor J. Toth

Attachment

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CORPORATE TELEMAGEMENT GROUP, INC.

OCT 12 1993

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Tariff F.C.C. No. 2
Original Page No. 4

TELECOMMUNICATIONS SERVICE

APPLICATION OF TARIFF

This tariff contains the regulations and rates applicable to the provision of telecommunications service by Corporate Telemagement Group, Inc. (hereinafter referred to as the "Carrier" or the "Company"), between and among domestic points within the United States and between domestic points and international locations, as specified herein. Service is furnished subject to transmission, atmospheric and like conditions.

All terms and conditions and limitations of liability contained in this tariff apply to all interstate services including international and domestic services provided by Carrier, including those where charges are established pursuant to contract, unless the contract explicitly provides otherwise.

Any member of the general public (including any natural person or legally organized entity such as a corporation, partnership, or governmental body) is entitled to obtain Service under this Tariff, provided that the Company reserves the right to deny Service: (A) to any Customer that, in the Company's reasonable opinion, presents an undue risk of nonpayment and refuses to comply with the deposit requirements, if any, set forth in this Tariff; (B) in circumstances in which the Company has reason to believe that the use of the Service would violate the provisions of this Tariff or any applicable law or regulation, or if any applicable law or regulation restricts or prohibits provision of the Service; or (C) if insufficient facilities are available to provide the Service.

In the case of existing Customers taking Service from the Company on the effective date of this Tariff, this Tariff shall supersede the rates, terms and conditions offered under any prior Service Agreement only to the extent inconsistent therewith. Otherwise, Customer Service shall continue uninterrupted under the corresponding newly Tariffed rates, terms and conditions of the closest corresponding Service offered under this Tariff.

The full details of the Service arrangement for Services offered pursuant to this Tariff, including more complete price information such as mileage, time-of-day, day-of-week, and/or Holiday rate structures and agreed upon distance estimates (in the case of private line services) will be set forth in the Company's Service Agreement and furnished to the Customer at the time the Customer's application for Service is accepted.

1.0 DEFINITIONS

Access: The connection between the Customer's location to an interexchange switching center.

[Billed Unit Rate: This is the actual unit charge which the Company will apply to each specific call according to the pricing plan and service type selected and accepted by the Customer and as reflected in a pricing schedule offered to the Customer at time of application for service or service change. The Billed Unit Rate will not exceed the Maximum Unit Rate for the same type of service.

ISSUED: May 5, 1993

EFFECTIVE: May 19, 1993

ISSUED BY: Thomas Houlihan, Rates and Tariffs
CORPORATE TELEMAGEMENT GROUP, INC.
P.O. Box 25219
Greenville, S.C. 29616-0219

TELECOMMUNICATIONS SERVICE

1.0 DEFINITIONS (Continued)

Local Exchange Company: A telephone company utility which provides local telecommunications services to a specific geographical area for business and residential customers.

Maximum Unit Rate: This is the uppermost charge which the Company could apply to a call for a particular type of service offered under this tariff. This uppermost or "Maximum" unit rate is the unit charge that would apply, for example, to a call of the longest possible distance, placed at the busiest period of a business day. Unless otherwise specified, the basic unit of charge is one minute.

2.0 GENERAL REGULATIONS

2.1 Use of Service

2..1.1 Services provided under this tariff may be used only for the transmission of communications by customers in a manner consistent with the terms of this tariff and regulations of the Federal Communications Commission.

2..1.2 Services provided under this tariff shall not be used for unlawful purposes.

2.2 Application for Service

2.2.1 The Company may require a Customer to sign an application form and to establish credit worthiness as a condition precedent to the initial establishment of service. The application shall state the date on which service shall begin and, in the case of Private Line Service, the points and estimated mileage between which Service is to be provided, the type of facilities to be provided, and any other special requirements related thereto.

2.2.2 Where special or dedicated T-1 or other levels of direct, non-switched local access service is required, such service may be provided directly by the Customer's Local Exchange Carrier, by an other Competitive Access Provider, or arranged by the Company. In the latter case, the Customer may be required to provide the Company with the necessary letter of agency required by such access providers if the Customer desires the Company to make arrangements for special or dedicated access services.

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TELECOMMUNICATIONS SERVICE

4.0 RATES AND CHARGES (Continued)

4.1. Maximum Unit Rates

Charges for MTS, IMTS, 800 Service, Conference Calling, Operator Assisted and Calling Card services are a function of call duration and may be time-of-day, distance, day-of-week and international country/location-destination sensitive. However, for purposes of the Company's tariff the Company's rates are specified in terms of the highest or maximum flat rate per unit of time only for each type of service, for the longest distance call possible using the particular service, at the peak busy hour of the peak business day, based on a one minute (or other unit of time) minimum call duration. The Customer's actual Billed Unit charge will never exceed the Maximum Unit Rate published in the Company's tariff. Actual per call total charge will be shown on the customer's invoice and generally will be much less than the tariffed Maximum Unit Rate, depending on day-of-week, time-of-day, distance or country/location of destination, applicable discounts and actual rounding as specified for the service.

4.2 Billed Unit Rate

In general, the Company's charges will be lower than those of AT&T for comparable service or pricing packages, and at least competitive with if not lower than those of other non-AT&T common carriers. This pricing policy of the Company might not be apparent, however, from the Maximum Unit Rate levels published in this tariff. Instead, the Company will promote its actual best prices and pricing plans in price lists and/or rate structures set forth in its promotional materials, sales literature, commercial advertising, and Customer service agreements. Actual Customer service charges will be calculated and billed according to the specific tariffed pricing plan or service agreement selected by the Customer. The pricing plan selected by the Customer may change from time-to-time. In any event, the actual billed charges will not exceed the Maximum Unit Rate for the corresponding service set forth in this Tariff, and in most instances will be lower than the Maximum Unit Rate, depending on the length of call, time-of-day, day-of-week, etc., as explained in the Company's service agreement for each type of service.

ISSUED: May 5, 1993

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TELECOMMUNICATIONS SERVICE**4.3 Disputed Unit Rates**

For each MTS, IMTS, 800 and Calling Card service a "Disputed Unit Rate" is offered which is set at a level reasonably below the "Maximum Unit Rate" for the corresponding service. The Disputed Unit Rate is the rate which shall be applied in all cases of a bona fide customer dispute over the accuracy of a charge for a call(s), or over the accuracy of the Company's billed charges. The Disputed Unit Rate is expressed in per minute or other similar units, and all calls to which it is applied shall be rounded to the next highest minute or other unit. In the absence of accurate records of the actual time duration of a disputed call, or in the case of lost call records, the duration shall be assumed to be 4.0 minutes.

The Disputed Unit Rate will be applied, for example, in the case of a Customer dispute over certain erroneous call charges appearing on an invoice by applying the Disputed Unit Rate to each minute of each disputed call, rounded to the next highest minute or other applicable unit for the type of service involved. By accepting service under this tariff the customer agrees to be bound by the Disputed Unit Rate in all cases of bill disputes over charges, for whatever reason, including but not limited to loss of call records, other loss of data, miscalculation of charges, charges for incorrect or defective service, or any challenge under the Communications Act of 1934 (Title 47, U.S. Code) to the legality of the Company's service, charges or practices.

4.4 Competitive Discounts

From time-to-time, based on competitive situations, the Company will offer special discount structures or promotional offerings to retain existing customers and/or develop new customers.

5.0 INTERSTATE DOMESTIC SERVICE CHARGES**5.1 Dial 1+ Access**

Maximum Unit Rate		Disputed Unit Rate	
<u>Initial 18 Sec's</u>	<u>Ea. Add'l 6 Sec's</u>	<u>Initial 18 Sec's</u>	<u>Ea. Add'l 6 Sec's</u>
\$0.075	\$0.025	\$0.0525	\$0.0175

Monthly Fees: \$11.00

Volume Discounts: The Company offers various discounts based on volume.

ISSUED: September 30, 1993

EFFECTIVE: October 1, 1993

ISSUED BY: Thomas Houlihan, Rates and Tariffs
CORPORATE TELEMAGEMENT GROUP, INC.
P.O. Box 25219
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TELECOMMUNICATIONS SERVICE

6.4.1 Travel Card International Rates (US Dollars) (Continued)

Country/Location Name	Maximum Unit Rates		C
	Initial 1 Minutes	Ea. Add'l Minute	
Turkey	2.57	1.45	MC
Turks and Caicos	1.70	1.14	
Tunisia	2.71	1.39	
Uganda	2.98	1.53	
Union Island	1.82	1.22	
United Arab Emirates	3.19	1.15	
United Kingdom	1.66	1.08	
Uruguay	2.78	1.23	
Uzbekistan	3.41	2.63	
Vanuatu	4.95	3.30	
Vatican City	1.97	1.09	MC
Venezuela	2.09	0.97	MC
Vietnam	2.91	2.71	N
Wallis/Futuna	3.88	1.45	N
Western Samoa	3.96	2.00	MC
Yemen Arab Rep.	3.46	1.25	MC
Yugoslavia	2.56	1.25	
Zaire	2.71	1.39	
Zambia	2.98	1.53	
Zimbabwe	2.98	1.53	MC

Travel Call International Disputed Unit Rates

The Disputed Unit Rate for International Travel Calls shall be the Maximum Unit Rate specified above less 10% for all Countries or International Locations.

6.5 INTERNATIONAL 800 SERVICE

The Company offers toll free inbound service from certain international locations.

Maximum Unit Rate Per Minute: \$2.25 Disputed Unit Rate Per Minute: \$2.02

Monthly Fee: \$11.00 plus \$10.00 per 800 number

Installation Set-up Charges: \$50.00

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